

DENNIS L. KENNEDY
Nevada Bar No. 1462
JOSEPH A. LIEBMAN
Nevada Bar No. 10125
JOSHUA P. GILMORE
Nevada Bar No. 11576
BAILEY ♦ KENNEDY
8984 Spanish Ridge Avenue
Las Vegas, Nevada 89148-1302
Telephone: 702.562.8820
Facsimile: 702.562.8821
DKennedy@BaileyKennedy.com
JLiebman@BaileyKennedy.com
JGilmore@BaileyKennedy.com

Attorneys for Defendants & Counterclaimant
RUSSELL J. SHAH, M.D.; DIPTI R. SHAH,
M.D.; RUSSELL J. SHAH, MD, LTD.; DIPTI
R. SHAH, MD, LTD.; and RADAR
MEDICAL GROUP, LLP dba UNIVERSITY
URGENT CARE

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ALLSTATE INSURANCE COMPANY,
ALLSTATE PROPERTY & CASUALTY
INSURANCE COMPANY, ALLSTATE
INDEMNITY COMPANY, and ALLSTATE
FIRE & CASUALTY INSURANCE
COMPANY,

Plaintiffs,

vs.

RUSSELL J. SHAH, M.D.; DIPTI R. SHAH,
M.D.; RUSSELL J. SHAH, MD, LTD.; DIPTI
R. SHAH, MD, LTD.; and RADAR MEDICAL
GROUP, LLP dba UNIVERSITY URGENT
CARE, Does 1-100, and ROES 101-200,

Defendants.

AND RELATED CLAIMS.

Case No. 2:15-cv-01786-APG-CWH

**STIPULATION AND ORDER TO
EXTEND DEADLINE FOR
DEFENDANTS TO FILE THEIR
OPPOSITION TO PLAINTIFFS'
MOTION FOR LEAVE OF COURT TO
FILE SUPPLEMENTAL RESPONSE
TO DEFENDANTS' MOTION FOR
SUMMARY JUDGMENT**

1 Plaintiffs/Counterdefendants ALLSTATE INSURANCE COMPANY, ALLSTATE
2 PROPERTY & CASUALTY INSURANCE COMPANY, ALLSTATE INDEMNITY COMPANY,
3 and ALLSTATE FIRE & CASUALTY INSURANCE COMPANY (the “Allstate Parties”), and
4 Defendants and Counterclaimant RUSSELL J. SHAH, M.D., DIPTI R. SHAH, M.D., RADAR
5 MEDICAL GROUP, LLP dba UNIVERSITY URGENT CARE, RUSSELL J. SHAH, MD, LTD.,
6 and DIPTI R. SHAH, MD, LTD. (the “Radar Parties”), by and through their respective attorneys of
7 record, stipulate and agree as follows:

8 1. On January 24, 2018, the Radar Parties filed their Motion to Stay Discovery Pending
9 Resolution of their Motion for Summary Judgment [ECF No. 224] (the “Stay Motion”);¹

10 2. On February 1, 2018, the Allstate Parties filed their Motion for Leave of Court to File
11 Supplemental Response to Defendants’ Motion for Summary Judgment [LR 7-2(g)] [ECF No. 230]
12 (the “Motion for Leave”);

13 3. On February 7, 2018, the Allstate Parties filed their Opposition to the Stay Motion
14 [ECF No. 233];

15 4. The Radar Parties presently have until February 15, 2018 to file their Opposition to
16 the Motion for Leave. Due to scheduling conflicts for the Radar Parties’ counsel, and because the
17 arguments to be presented in the Opposition to the Motion for Leave will address, in part, the
18 arguments to be presented in the Reply in Support of the Stay Motion, the Radar Parties shall now
19 have up to and including February 23, 2018 to file their Opposition to the Motion for Leave; and

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 _____
27 ¹ The Radar Parties filed their Motion for Summary Judgment (Hearing Requested) [ECF No. 183] on October
28 17, 2017. The Allstate Parties filed their Opposition to the Motion for Summary Judgment [ECF No. 195] on November
21, 2017. The Radar Parties filed their Reply in Support of the Motion for Summary Judgment [ECF No. 213] on
December 22, 2017.

5. This is the first stipulation to extend the deadline to file the Opposition to the Motion for Leave. This stipulation is made in good faith and not to delay the proceedings.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

DATED this 9th day of February, 2018.

McCORMICK, BARSTOW, SHEPPARD,
WAYTE & CARRUTH LLP

By: /s/ Todd W. Baxter
DYLAN P. TODD
TODD W. BAXTER
8337 West Sunset Road, Suite 350
Las Vegas, NV 89113

ERON Z. CANNON
FAIN ANDERSON VANDERHOEF
ROSENDAHL O'HALLORAN
SPILLANE PLLC
701 Fifth Avenue, Suite 4750
Seattle, WA 98104

Attorneys for Plaintiffs/Counterdefendants

IT IS SO ORDERED.

DATED this 9th day of February, 2018.

BAILEY ♦ KENNEDY

By: /s/ Joshua P. Gilmore
DENNIS L. KENNEDY
JOSEPH A. LIEBMAN
JOSHUA P. GILMORE
8984 Spanish Ridge Avenue
Las Vegas, NV 89148

Attorneys for Defendants & Counterclaimant


UNITED STATES MAGISTRATE JUDGE

DATED: February 12, 2018